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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

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Ref: EPR-ER

POLREP #3

Vermiculite Intermountain Site

Salt Lake City, Utah

I. HEADING

Date: April 27, 2004
From: Floyd Nichols, On Scene Coordinator
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Agency: EPA/8
Unit: Region VIII - Emergency Response Program
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Denver Colorado 80202
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To: Kevin Mould, EPA Headquarters
POLREP No.: 3
Site: Vermiculite Intermountain Site
333 West 100 South (former)
Salt Lake City, Utah

II. BACKGROUND

Site Number: 08GA
Party Conducting the Action: EPA
Response Authority: CERCLA
CERCLIS No: —
NPL Status: No
Action Memorandum Status: Approved April 7, 2004
Start Date: April 14, 2004
Complete Date: TBD

III. SITE INFORMATION

A. Incident Category

Time Critical Removal Action

B. Site Description

1. Site description

Vermiculite Intermountain ("VI"), located on the west edge of downtown Salt Lake City, UT, is one of many facilities that received vermiculite ore from a mine near Libby, Montana. The Libby mine, at one time, produced about 80% of the world's supply of vermiculite ore. From Libby, some of the ore was shipped to various locations throughout the United States for further processing and distribution. Vermiculite ore from the Libby mine is co-mingled with amphibole asbestos of the tremolite-actinolite-richterite-winchite solution series ('tremolite asbestos'), and varying amounts of tremolite asbestos remain at many of the facilities which managed and/or processed ore from the Libby mine.



The VI facility received vermiculite ore in rail cars from 1940 until the early 1980s. In the mid 1980s, the facility was sold and the processing plant was relocated to another site several blocks away. At the VI facility, the ore was heated in a dry furnace until the imbedded layers of asbestos expanded ('exfoliated') (the process resembles that which happens to popcorn when it is heated). The exfoliated vermiculite (also known as "Zonolite") was then released to wholesale and retail markets for a variety of uses including home and building insulation and as a soil amendment. The original VI boundaries have changed over time - portions of the former site now consist of a Utah Power & Light (UPL) substation, a commercial parking lot, and small businesses.

The surrounding neighborhood is primarily commercial and recreational.

2. Removal Site Evaluation and Site Characteristics

The VI property and the surrounding area have undergone extensive urban redevelopment in the last 2-3 decades, and the original VI property boundaries are now indistinct. A former employee, however, stated that the majority of the VI exfoliation building was on the parcel now used by UPL (a PacifiCorp subsidiary) as an electrical substation. Some gravel fill has been placed in and around the substation hardware and across the adjacent parking/service areas. The substation is secured at all times by chain-link fencing and locked gates. Properties adjacent to the substation are currently used for a variety of municipal and/or commercial purposes.

During substation walkthrough inspections in 2002, what appeared to be vermiculite could be seen on the ground surface in several locations. EPA subsequently sampled portions of the substation property in October 2002. As geoprobe core samples were obtained, what appeared to be visible vermiculite/asbestos waste material (a.k.a., "stoner rock") could be seen in the cores. Analysis of surface and subsurface soils indicated percent-levels of tremolite asbestos in some surface locations and at some subsurface horizons.

Following EPA notification of the analytical findings, UPL, through a local asbestos firm in December 2002, removed loose vermiculite from the scarified ground surface using a high-efficiency vacuum in order to address immediate exposure concerns for their employees. Efficacy samples following that mitigation effort have not been collected.

Percent levels of tremolite asbestos remain in the subsurface at the UPL substation, and trace to percent levels are also present on the ground surface within the substation.

Additional Libby Amphibole (LA)-focussed samples were collected at various locations within the (downtown) Salt Lake City one-square-block area (bordered by 100 South, 400 West, 200 South, and 300 West Streets) surrounding the old "VI" location.

Utah Paper Box Company

Ambient air samples, personal air samples, and dust samples were taken throughout the facility, and no LA contamination was found.

Artistic Printing

Ambient air samples, personal air samples, and dust samples were collected throughout the facility, with LA being detected in all dust and one ambient air sample. Following detailed discussions about activity timing and sequencing, the facility owner was able to identify an 'economic window of opportunity' for the TCRA. Accordingly, EPA initiated the Removal on April 14. Currently, Artistic Printing continues in daily operation, 5-days per week. Cleanup crews enter the facility as it is being vacated by the business employees at the end of the workday. Removal

actions continue overnight (and on weekends) until the employees return at the start of the next workday. Current schedules call for the business to cease operations entirely on May 19. Subsequently, the TCRA will continue 24-hours per day until clearance sampling shows ND for LA.

Frank Edwards Building (owned by La Quinta Corporation)

Dust samples collected inside the vacant building showed LA contamination in two of three rooms. Additional interior samples are being collected so as to further delineate the interior spaces to be included in the pending EPA-lead TCRA. Mobilization for cleanup inside the building is expected in mid-May.

AMPCO Parking Lot (owned by La Quinta Corporation)

Core samples show trace amounts of LA at a depth of 32" to 38" below the surface of the parking lot. Additional sub-surface samples are being collected across the parking lot in order to further define the extent of contamination. Scheduling of the TCRA for cleanup of the parking lot is pending.

3. Description of threat

Asbestos is a hazardous substance as defined by the NCP (40 CFR Section 302.4). Tremolite asbestos is of concern because chronic inhalation of excessive concentrations of the fibers can possibly result in lung diseases such as asbestosis, mesothelioma, and cancer. Subacute exposures as short as a few days may cause mesothelioma.

4. State and Local Role

EPA has consulted with the Utah Department of Environmental Quality (UDEQ) concerning the sampling events and results. Neither UDEQ nor local agencies have the resources to conduct the needed site investigations or clean-ups independently.

B. Current Actions

EPA is continuing a cleanup of Artistic Printing, with a projected completion date of May 31, 2004. Actions to date include construction of interior isolation/containment areas, HEPA-Vacuuming and wet-wiping feed-stock, finished products, and related miscellaneous items, and cleaning 'fringe' and 'isolated' areas within the building. Relocation and cleaning of business office space(s) will be initiated the week of May 1.

C. Future Plans

EPA will continue collecting dust samples inside the Frank Edwards Building so as to determine the extent of contamination. Tentative mobilization date for EPA-led TCRA inside the Frank Edwards Building is May 2004.

EPA and PacifiCorp (Utah Power and Light parent company) continue negotiating an Administrative Order on Consent (AOC) for the cleanup of the UP&L substation parcel. Tentative mobilization date for PacifiCorp's action is June 2004.

EPA will continue collecting and evaluating sub-surface samples from the Ampco Parking Lot.

D. Key Issues

None identified at this time.